



**MEMO ENDORSED**

## HAMRA LAW GROUP

1 LINDEN PL, GREAT NECK, NY 11021  
TEL: 646-590-0571, FAX: 646-619-4012  
WEB: [WWW.HAMRALAWGROUP.COM](http://WWW.HAMRALAWGROUP.COM)

The application is X granted  
\_\_\_\_\_ denied

Edgardo Ramos, U.S.D.J.  
Dated: March 14, 2022  
New York, New York 10007

March 14, 2022

**VIA ECF**

Judge Edgardo Ramos  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: Duka v. Alliance Tri-State Construction, Inc et al  
1:20-cv-06648-ER

**LETTER REQUEST FOR ADJOURNMENT OF DISCOVERY CONFERENCE**

To Your Honor,

This office represents Defendants in the above-captioned action. We write jointly with Plaintiff's counsel in response to the March 9, 2022 order of the Court, calling for a discovery conference on March 17, 2022.

At the writing of this letter, Defendants' have disclosed a number of documents in response to the demands of Plaintiff and initial interrogatory responses. Counsel for Plaintiff and I met and conferred today, March 14, regarding the recently disclosed discovery items.

Following the telephonic meet and confer, counsel agreed to jointly request that the discovery conference scheduled for March 17, 2022 be adjourned without a follow up date. While Plaintiff's counsel has not yet had the opportunity to fully review Defendants' production, both Parties agree that the conference is no longer necessary at this time, and that the Parties will endeavor to resolve any remaining discovery disputes amongst themselves prior to seeking further court intervention.

The Parties thank the Court for its time and consideration in this matter.

Best regards,

Kevin S. Johnson, Esq.